

In The Matter Of:

A.J., et al v.

MASP, LLC

30(b)(6) MASP

July 29, 2024

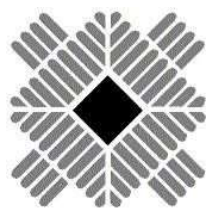
(Alpesh Patel)

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(Alpesh Patel)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.J. and Q.C.,)	
)	
Plaintiffs,)	CIVIL ACTION FILE
)	
vs.)	NO. 1:23-cv-04247-JPB
)	
MASP, LLC,)	
)	
Defendant.)	

Videotaped 30(b)(6) deposition of MASP, LLC (ALPESH PATEL), taken on behalf of the Plaintiffs, pursuant to the stipulations contained herein, signature being reserved, in accordance with the Federal Rules of Civil Procedure, before Kelly D'Amico, RPR, Certified Court Reporter and Notary Public, at 1420 Peachtree Street, N.E., Suite 800, Atlanta, Georgia, on the 29th day of July, 2024, commencing at the hour of 10:04 a.m.

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(Alpesh Patel)

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(Alpesh Patel)

REPORTER DISCLOSURE OF NO CONTRACT

I, Kelly D'Amico, Certified Court Reporter, do hereby disclose pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I am a Georgia Certified Court Reporter. D'Amico & Associates/I was contacted by the party taking the deposition to provide court reporting services for this deposition; D'Amico & Associates/I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b); nor am I disqualified for a relationship of interest under the provisions of O.C.G.A. 9-11-28(c).

There is no contract to provide reporting services between myself or any person with whom I have a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond my/D'Amico & Associates' usual and customary rates have been disclosed and offered to all parties.

This, the 29th day of July, 2024.

KELLY D'AMICO, RPR, CCR-B-1322

(Alpesh Patel)

FIRM DISCLOSURE OF NO CONTRACT

I, Kelly D'Amico, do hereby disclose pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that D'Amico & Associates was contacted by the taking attorney to provide court reporting services for this deposition and there is no contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) for the taking of this deposition.

There is no contract to provide reporting services between D'Amico & Associates or any person with whom D'Amico & Associates has a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond D'Amico & Associates' usual and customary rates have been disclosed and offered to all parties.

This, the 29th day of July, 2024.

KELLY D'AMICO, CEO
D'AMICO & ASSOCIATES

(Alpesh Patel)

A P P E A R A N C E S

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Videographer:

CHRIS BENNETT

- - -

30(b)(6) MASP - July 29, 2024
(Alpesh Patel)

1 [VIDEO ON]

2 THE VIDEOGRAPHER: All right. This will
3 be the 30(b)(6) representative deposition of
4 MASP, LLC. Today's date is July 29th, 2024 and
5 the time is 10:04 a.m. and we are on the
6 record.

7 Would the attorneys present please state
8 their names and who they represent?

9 MR. TONGE: Yeah, Jonathan Tonge for the
10 plaintiffs.

11 MS. MERRILL: Marissa Merrill on behalf
12 of defendant.

13 MS. WAGNER: Kori Wagner on behalf of the
14 defendant.

15 THE VIDEOGRAPHER: Would the court
16 reporter please swear in the witness.

17 THE COURT REPORTER: All right. Please
18 raise your right hand for me.

19 THE WITNESS: (Complies with request.)

20 ALPESH PATEL,
21 having been first duly sworn, was examined and
22 testified as follows:

23 EXAMINATION

24 BY MR. TONGE:

25 Q Okay. Mr. Patel, nice to meet you. I'm

1 Jonathan Tonge. I represent the plaintiffs in this
2 case.

3 MR. TONGE: So this will be the
4 deposition of Defendant MASP, M-A-S-P, LLC
5 taken pursuant to Notice and agreement of
6 counsel. It's taken for all purposes allowed
7 under the Federal Rules of Civil Procedure,
8 including use at trial.

9 Would you guys like to reserve the
10 objections other than form and responsiveness?

11 MS. MERRILL: That's agreeable.

12 MR. TONGE: Okay.

13 BY MR. TONGE:

14 Q Let's see. Could you please state your
15 full name for the record?

16 A Alpesh Patel.

17 Q Okay. And do you go by -- you go by Al?

18 A Al.

19 Q Okay.

20 A Uh-huh (affirmative).

21 Q Have you ever given a deposition before
22 today?

23 A No, sir.

24 Q Okay. You understand that you're under
25 oath?

1 A Yes, sir.

2 Q And you understand that your answers
3 today are on behalf of the company?

4 A Yes, sir.

5 Q Okay. Will you agree to be truthful and
6 give complete answers?

7 A Yes, sir.

8 Q Okay. And if you don't understand
9 anything I ask, I can ask -- I can get --

10 A Okay.

11 Q -- caught up and ask complicated
12 questions, and so if you don't understand anything,
13 just say so and I'll reword it, I'll rephrase it.

14 A Okay.

15 Q If at any time we're talking past each
16 other, just let me know and I'll --

17 A All right.

18 Q -- work to make sure we understand.
19 Okay?

20 And also just remember to answer audibly
21 with a yes or a no --

22 A Yes or no, yes.

23 Q -- instead of a --

24 A Shaking the head.

25 Q -- nod or shake of your head. Yeah,

1 yeah.

2 Okay. Today we're going to talk
3 primarily about the year 2013, and so basically all of
4 my questions will be in the time period of 2012,
5 2013 --

6 A Okay.

7 Q -- unless I say otherwise. Okay?

8 A Okay.

9 Q So if I'm asking you about what the hotel
10 knew or didn't know or did or didn't do, I'm talking
11 about that time period. Okay?

12 A That time period, okay.

13 Q And let's see. And so you individually
14 are a part owner of the hotel? You own part of the
15 defendant company?

16 A Yes, sir.

17 Q Okay. Can you tell me who the other
18 owners are?

19 A It's my sister and my dad --

20 Q Okay.

21 A -- and my parents, yeah.

22 Q And so who is Baldev Patel?

23 A My dad.

24 Q Okay. And did he have anything to do
25 with the operation of the hotel?

1 A No, sir.

2 Q Okay. He was --

3 A Silent partner.

4 Q -- sort of like a silent partner?

5 A Silent partner.

6 Q Okay.

7 A All three are silent partners.

8 Q Okay. And so which one is your sister
9 just so I know?

10 A Shilpa.

11 Q Shilpa.

12 A Uh-huh (affirmative).

13 Q Okay. And so Narmada --

14 A Is my mother.

15 Q -- is your mother?

16 A Uh-huh (affirmative).

17 Q Okay.

18 MS. MERRILL: Make sure you just let him
19 finish his question --

20 THE WITNESS: Okay.

21 MS. MERRILL: -- before you jump in.

22 THE WITNESS: Okay.

23 MS. MERRILL: That will make it easier
24 for her to --

25 THE WITNESS: Okay.

1 MS. MERRILL: -- transcribe.

2 BY MR. TONGE:

3 Q Do you know which -- what percentage each
4 person owns or...

5 A Shilpa owns 30 percent. I own -- back in
6 2013 I had owned 30 percent.

7 Q Okay.

8 A And then my mom and dad owned 20 each
9 back then.

10 Q Okay. And what was your job title at the
11 hotel?

12 A Manager, day-to-day manager.

13 Q Okay. Did you live at the hotel or...

14 A In 2013, no.

15 Q Okay. Did you at any time?

16 A Yes.

17 Q When was that?

18 A From 2007 -- or no. 2009 till 2011 or
19 maybe '12, early '12.

20 Q Okay. And what was your -- describe your
21 day to day and your responsibilities as manager for
22 the hotel.

23 A Basically finance, ordering supplies,
24 employees, hiring/firing --

25 Q Uh-huh (affirmative).

1 A -- day-to-day operations, checking rooms,
2 you know, make sure everything is perfect.

3 Q Okay. So would you do -- would you work
4 the front desk at times or work in the front office as
5 well or --

6 A Front desk was not the job title, but if
7 somebody had called out sick or -- I may have filled
8 in, but that was not the -- part of the job.

9 Q Okay.

10 A Not every day front desk.

11 Q Okay.

12 A But if somebody wanted -- got sick or
13 wanted to leave early, then I would help out.

14 (Thereupon, marked for identification,
15 Plaintiffs' [Exhibit 1](#).)

16 BY MR. TONGE:

17 Q Right, okay. I'm going to show you
18 what's marked as [Exhibit 1](#), Plaintiffs' Exhibit 1, if
19 I can get the sticker off. There we go.

20 A Okay.

21 Q And just give that a look.

22 MS. MERRILL: Thank you.

23 MR. TONGE: I have another if y'all want
24 that (indicating).

25 BY MR. TONGE:

1 Q And do you recognize this document? Have
2 you seen this before?

3 A Yes.

4 Q Okay. And this is the notice for your
5 deposition today; correct?

6 A Uh-huh, yes.

7 Q And if you go to page 2 there --

8 A Uh-huh (affirmative).

9 Q -- you see the Matters of Examination.
10 Are you the person who -- do you want to read these
11 before I ask you questions or... it's a few pages,
12 but --

13 A All of them or just Number 2 focus?

14 Q Really all of them. But are you -- are
15 you the person who is -- who is best prepared and most
16 knowledgeable to testify on behalf of the company --

17 A Yes.

18 Q -- as related to these topics?

19 A Yes, sir.

20 Q About the operation of the hotel, the
21 safety of the hotel, all of those types of things?

22 A Yes, sir.

23 Q Okay. How were you selected to testify
24 today for the company?

25 A I was on site every day --

1 Q Uh-huh (affirmative) .

2 A -- day to day, so...

3 Q What have you done to prepare for today's
4 deposition?

5 A I tried to see what I could find out
6 about the 2013 old e-mails or old paperwork that I
7 could come up with.

8 Q Okay. And did you have any old e-mails
9 or paperwork?

10 A Nothing, yeah.

11 Q Okay.

12 A Our records only go back, I think, seven
13 years.

14 Q Okay.

15 A And I think this came early this year or
16 end of last year maybe, I think, or...

17 Q It was in '23 when the case got filed --

18 A So (overspeak) .

19 Q -- yeah.

20 And just so I understand, so you didn't
21 know anything about the plaintiffs' allegations in
22 this case until you received this lawsuit?

23 A Correct.

24 Q Is that correct?

25 A Correct.

1 Q Okay. Who did you speak to to prepare
2 for the deposition today?

3 A Was it Kori or --

4 MS. WAGNER: Uh-huh (affirmative).

5 A Kori.

6 BY MR. TONGE:

7 Q Uh-huh (affirmative). Did you meet with
8 anybody else who worked at the hotel?

9 A No.

10 Q Okay. And you talked about looking for
11 documents. Did you review in this case -- here, I'll
12 just go ahead and give you this too.

13 MR. TONGE: I'll mark this as Plaintiffs'
14 [Exhibit 2](#). There you go.

15 MS. MERRILL: Thanks.

16 (Thereupon, marked for identification,
17 Plaintiffs' [Exhibit 2](#).)

18 BY MR. TONGE:

19 Q And so in this case, other than some
20 insurance policies which we have, this is the only
21 document that we've received in this case. Is
22 there -- are there any other documents beyond -- and
23 can you just identify what this document is for me?

24 A This is the building layout.

25 Q Okay. And so the 100s would be the first₁₅

1 floor and the 200s the second floor?

2 A Correct.

3 Q So did you review any document other than
4 this document?

5 A Other than --

6 MS. MERRILL: Other than --

7 BY MR. TONGE:

8 Q -- for this deposition?

9 A There was nothing available --

10 Q Okay.

11 A -- from that time.

12 Q Okay. Okay. We can set that aside.

13 That was all --

14 A Okay.

15 Q -- I was asking there.

16 When did -- when was MASP created?

17 A 2007.

18 Q Okay. And when did it purchase the
19 hotel?

20 A That time.

21 Q Okay. Does it still own the hotel?

22 A It does.

23 Q Okay. Does MASP own any other hotels?

24 A No, sir.

25 Q Okay. Has it ever owned any other

1 hotels?

2 A No, sir.

3 Q Okay. And has MASP been the company that
4 operated the hotel the entire time it's owned it?

5 A Correct.

6 Q Okay. There was never any management
7 company or outside --

8 A No, sir.

9 Q Okay. Let's go to -- let's see. Oh, I'm
10 already at my last exhibit. This will be Plaintiffs'
11 [Exhibit 3](#).

12 MS. MERRILL: Thanks.

13 (Thereupon, marked for identification,
14 Plaintiffs' [Exhibit 3](#).)

15 BY MR. TONGE:

16 Q Have you seen this document before?

17 A Yes, sir.

18 Q Okay. And these are the interrogatories
19 that the plaintiffs asked -- asked the company
20 questions and you guys responded. And so in this, if
21 you go to page 2, like your responses are the bold
22 type --

23 A Uh-huh (affirmative).

24 Q -- and the questions are the not-bold
25 type.

1 A Okay.

2 Q If you go to Number 11, which will be
3 page 8 --

4 A Okay.

5 Q -- and so this question asked for the
6 identity of the people who were employed at the hotel
7 and their contact information. And then if you --
8 after some objections, if you flip to the next page,
9 you responded that (as read): Defendant MASP is no
10 longer in possession, custody or control of documents
11 related to its employees or subcontractors from 2008
12 through 2013. In further response, Defendant MASP
13 recalls that Nikki Robinson worked at the hotel for a
14 period of time as the front desk clerk but cannot
15 recall whether it was during the requested time frame.

16 Did I read that right?

17 A Correct.

18 Q Okay. And so just to deal with Nikki
19 Robinson, so do you have -- you have no idea what time
20 period she worked at the hotel?

21 A I know it was early. Like 2000 when we
22 bought the hotel, she was there and then she had left
23 and came back for a while, but...

24 Q So do you know as you sit here today if
25 she worked there in 2013?

1 A I'm not sure.

2 Q Okay. And so up here on the first line
3 on page 9 it says (as read): Upon information and
4 belief, Defendant MASP, M-A-S-P, is no longer in
5 possession, custody or control of documents.

6 Do you know why you put, why you answered
7 that "on information and belief"? Was there a reason
8 for that or...

9 A Well, we keep everything for seven years,
10 so all the documents, the employee files; and then
11 they're no longer there.

12 Q Uh-huh (affirmative). And so --

13 A So if they were still there from 2013,
14 then we would keep them, their file.

15 Q Okay. And so what I'm asking, I guess,
16 is: This information that you provided here about not
17 having documents or about Nikki Robinson, that's not a
18 guess; right?

19 A Correct.

20 Q This is --

21 A Correct.

22 Q This is true? This is true to the best
23 of your ability?

24 A Correct.

25 Q Okay. And so this, this question, also 19

1 asked for not just documents but information, and so
2 you do not have any information about -- you don't
3 have employee names or contact information --

4 A Correct.

5 Q -- or anything from that time period?

6 A Correct.

7 Q Okay. And so beyond this answer you
8 don't know the identity of any employees that worked
9 at the hotel in 2013?

10 A Correct.

11 Q Okay. And so there's not any other
12 information that you could provide about them; right?

13 A Correct.

14 Q Okay. We've covered Nikki Robinson. And
15 so I just want to make sure that, you know, we have
16 any evidence from the hotel related to our clients'
17 allegations. Okay?

18 A Okay.

19 Q So let's go to Response Number 5, so back
20 up a little bit in that exhibit. I mean, you've
21 already actually said this, but in Number 5 you state
22 that you didn't become aware of this incident until
23 you received the lawsuit in this case?

24 A Correct.

25 Q That's correct?

1 And so you don't have any documents or
2 records of any kind regarding the plaintiffs being
3 trafficked for sex at the hotel?

4 A Correct.

5 Q And the hotel doesn't have any written or
6 verbal statements from any witnesses about the
7 plaintiffs being trafficked at the hotel?

8 A Correct.

9 Q And other than Nikki Robinson, who we're
10 not sure of her time periods, the hotel doesn't know
11 the name or contact information of any --

12 A Correct.

13 Q -- any employees at the hotel?

14 A Correct.

15 MS. MERRILL: For 2013?

16 MR. TONGE: For 2013, yes, yes.

17 A '13, yeah, yeah. From the last three
18 years.

19 BY MR. TONGE:

20 Q Thank you. Yeah, yeah.

21 A Yeah.

22 Q Let's stick to 2013.

23 A '13, yeah.

24 Q Yeah, yeah, yeah. Thank you.

25 And you personally -- I know this is your

1 30(b)(6) and just speaking for the company, and maybe
2 we could shut this down and do a personal unless y'all
3 object, but do you personally have any other
4 information about employees, witnesses or any
5 information about plaintiffs' allegations that the
6 hotel does not have?

7 A No, sir.

8 Q Okay. So your personal knowledge --

9 A The same as personal knowledge.

10 Q -- is the same as what you've testified
11 to today?

12 A Correct, correct.

13 Q Okay. And so the hotel just doesn't have
14 any information or evidence about the plaintiffs'
15 allegations at all?

16 A Correct.

17 MR. TONGE: Okay. I think that's all
18 I've got.

19 MS. MERRILL: Okay. I don't have any
20 follow-up.

21 THE VIDEOGRAPHER: Going off the record
22 at 10:17.

23 [VIDEO OFF]

24 MS. MERRILL: And we'll read and sign.

25 MR. TONGE: And I'll take the transcript 22

1 and video as usual.

2 THE COURT REPORTER: Do you like
3 electronic?

4 MS. MERRILL: Yes.

5 THE COURT REPORTER: Thank you.
6 Would you like video also?

7 MS. WAGNER: Probably, yeah.

8 THE COURT REPORTER: Do you want a sync?

9 MS. WAGNER: Yes.

10 (Deposition concluded at 10:19 a.m.)

11 - - -

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25

(Alpesh Patel)

C E R T I F I C A T E

I hereby certify that the foregoing transcript was reported, as stated in the caption; that the witness was duly sworn and elected to reserve signature in this matter; that the colloquies, questions and answers were reduced to writing under my direction; and that the foregoing pages 1 through 23 represent a true, correct, and complete record of the evidence given.

I further certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); that I am a Georgia Certified Court Reporter here as a representative of D'Amico & Associates; that I/D'Amico & Associates was contacted by the party taking the deposition to provide court reporting services for this deposition; that I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 10.B of the Rules and Regulations of the Board; and by the attached disclosure forms I confirm that I/D'Amico & Associates is not a party to a contract prohibited by O.C.G.A. 15-14-37 (a) or (b).

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of D'Amico & Associates and the signature and original seal is attached thereto.

This, the 5th day of August, 2024.



KELLY D'AMICO, RPR, CCR-B-1322

(Alpesh Patel)

E R R A T A S H E E T

Any changes in form or substance which you desire to make to your deposition testimony shall be entered upon the deposition with a statement of the reasons given for making them.

To assist you in making any such corrections, please use the form below. If supplemental or additional pages are necessary, please furnish same and attach them to this errata sheet.

- - -

I, the undersigned, ALPESH PATEL, do hereby certify that I have read the foregoing deposition and that said transcript is true and accurate, with the exception of the following changes noted below, if any:

Page____/Line____/Should Read:_____

Reason:_____

Page____/Line____/Should Read:_____

Reason:_____

Page____/Line____/Should Read:_____

Reason:_____

(Alpesh Patel)

1 Page ____/Line ____/Should Read: _____

2 _____

3 Reason: _____

4 _____

5 Page ____/Line ____/Should Read: _____

6 _____

7 Reason: _____

8 _____

9 Page ____/Line ____/Should Read: _____

10 _____

11 Reason: _____

12 _____

13 Page ____/Line ____/Should Read: _____

14 _____

15 Reason: _____

16 _____

17 Page ____/Line ____/Should Read: _____

18 _____

19 Reason: _____

20 _____

21 _____

ALPESH PATEL,

22 _____

23 Sworn to and subscribed before me,

24 _____, Notary Public.

25 _____

This _____ day of _____, 20____.

My Commission Expires: _____

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